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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

**Dimonique Gibbs, individually; A.L.G.,
a minor (August 30, 2013), by and
through his natural parent
Dimonique Gibbs; A.G., a minor (July
15, 2016), by and through her natural
parent Dimonique Gibbs; J.E., a minor,
(April 22, 2008), by and through her
natural parent Dimonique Gibbs;**

Plaintiff,
vs.

**Bonnie Lynn Gutweiler, individually;
Heding Truck Service, Inc., A Domestic
Business, DOES I through X; AND ROE
Corporations I through X, inclusive,**

Defendants.

Case No.: 2:23-cv-01896-JCM-MDC

**Stipulation and Order to Extend
Discovery (First Request)**

Pursuant to Fed R. Civ. P. 6, Fed. R. Civ. P. 26, LR IA 6-1, LR IA 6-2, LR 7-1, and LR 26-3, the parties, by and through their respective counsel of record, stipulate and agree that there is good cause to extend the discovery deadlines in the operative discovery plan [ECF No.13], as set forth below.



1 **A. Pursuant to LR 26-4(a), the parties stipulate that the following discovery**
2 **was completed:**

- 3
- 4 1. The parties have served initial disclosures pursuant to FRCP 26(a)(1);
- 5 2. Plaintiff has propounded written discovery on Defendants;
- 6 3. Defendants have propounded written discovery on Plaintiff;
- 7 4. Defendant Bonnie Lynn Gutweiler has answered Requests for Production
- 8 of Documents;
- 9 5. Plaintiffs' have answered written discovery requests;
- 10

11 **B. Pursuant to LR 26-4(b), the parties stipulate that they need to complete the**
12 **following discovery:**

- 13 1. Defendant Bonnie Lynn Gutweiler's responses to Interrogatories.
- 14 2. Defendant Heding Truck Services, Inc.'s responses to written discovery.
- 15 3. Deposition of Plaintiff.
- 16 4. Deposition of Defendants.
- 17 5. Deposition of percipient witnesses.
- 18 6. Initial and Rebuttal Expert Disclosures.
- 19 7. Deposition of Defendant's FRCP 30(b)(6) witnesses and/or employees.
- 20 8. Depositions of Plaintiff's medical providers.
- 21 9. Depositions of each party's respective experts.
- 22 10. Additional Written Discovery; and
- 23 11. Any other discovery that may become necessary upon completion of
- 24 the discovery above.
- 25

26 **C. Pursuant to LR 26-4(c), the parties stipulate an extension is needed for the**
27 **following reasons:**

28 First, Defendant's counsel has had severely limited availability due to being on a



1 three-week trial from March 18, 2024 to April 5, 2024 in *Jehorek v. Phillips Crane, A-19-*
2 *792801-C*. As such, the parties have not been able to schedule depositions including
3 the depositions of the Defendant as well as the FRCP 30(b)(6) witness for Defendant
4 in advance of the parties current initial expert disclosure deadline. Based on the
5 outstanding discovery still needed and the pending motions before the Court, there
6 is good cause to extend the discovery deadlines ninety (90) days.

7
8 **D. Pursuant to LR 26-4(d), the parties stipulate to the following proposed**
9 **schedule for completing all remaining discovery:**

10 The parties agree to extend all the discovery deadlines in this case by ninety (90)
11 days, as set forth below:

- 12
- 13 1. Extend the discovery cut-off deadline from 7/26/24 to 10/24/24;
- 14 2. Extend the deadline to amend the pleadings and add parties from 5/27/24 to
- 15 8/26/24;
- 16 3. Extend the date for initial expert disclosures from 5/27/24 to 8/26/24;
- 17 4. Extend the date to disclose rebuttal expert witnesses from 6/26/24 to 9/24/24;
- 18 5. Extend the date to file dispositive motions from 8/26/24 to 11/25/24; and
- 19 6. Extend the date to file the Joint Pre-Trial Order from 9/25/24 to 12/24/24. If
- 20 dispositive motions are filed, the joint pretrial order is due thirty (30) days from
- 21 the entry of the court's ruling on the motions.
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7. Fed. R. Civ. P. 26(a)(3) Disclosures must be included in the Joint Pre-Trial Order.

DATED this 16th day of April, 2024

DATED this 17th day of April, 2024

H&P LAW

THORNDAL ARMSTRONG, PC

/s/ Marjorie Hauf

/s/ Bruce Scott Dickinson

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*Bonnie Gutweiler and Heding Truck
Service, Inc.*

ORDER

IT IS SO ORDERED.


Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Dated: 4/19/2024